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April 10, 2025

VIA ECF

Honorable Denise L. Cote
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Courtroom 18B
New York, NY 10007-1312

The conference is cancelled.
A status letter is due
May 23, 2025.
Denise Cote
4/11/25

Re: *Beauregarde Holdings LLP, et al. v. The Province of La Rioja*, 25-cv-2280

Dear Judge Cote:

This firm represents Plaintiffs Beauregarde Holdings LLP, Beauregarde Holdings II LLP, and Sandglass Select Fund LP ("**Plaintiffs**") in the above-referenced matter.

We write regarding the Notice of Initial Pretrial Conference (ECF 10) to request that the pretrial conference scheduled for May 22, 2025 at 11:00 a.m. (the "**Initial Pretrial Conference**") be conducted virtually due to the unavailability of the undersigned principal trial counsel for Plaintiffs to be present in New York on May 22. This case is particularly appropriate for a virtual Initial Pretrial Conference because, as occurred in *Beauregarde Holdings, LLP, et al. v. The Province of La Rioja*, 24-cv-2955, Plaintiffs intend to move for summary judgment shortly after the Defendant the Province of La Rioja (the "**Province**") answers the complaint on May 19, 2025 and no discovery will be necessary to resolve this matter by summary judgment. Thus, other than the scheduling for the anticipated motion, there will be very little to discuss at the conference.

In the alternative, Plaintiffs request that the Initial Pretrial Conference be adjourned to the early part of the week of June 2, 2025, when Plaintiffs' principal counsel is available to appear in person.

We have been in contact with counsel for the Province who has indicated that the Province consents to the Initial Pretrial Conference being conducted virtually, as well as to the adjournment request. The Province's counsel is available the week of June 2. No prior request for an adjournment of the Initial Pretrial Conference has been made.

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Respectfully submitted,

/s/ Dennis H. Hranitzky

Dennis H. Hranitzky

*Counsel for Plaintiffs Beauregarde Holdings
LLP, Beauregarde Holdings II LLP, and Sandglass
Select Fund LP*

cc: Counsel for Defendant the Province of La Rioja (via email)